

NRDWSF PERMIT APPLICATION UNIT MANAGERS' MEETING

ATTENDEES: R. C. Bowman (WHC) DATE: December 12, 1989
W. D. Cummings (Ecology)
D. L. Duncan (DOE-RL) LOCATION: Richland, WA
M. E. Lerchen (Ecology)
J. W. Olson (WHC)
S. M. Price (WHC)
S. D. Stites (DOE-RL)
K. A. Woodworth (WHC)

PURPOSE: Discuss the proposed schedule for responding to the Notice of Deficiency (NOD) resulting from the ongoing review by the Washington State Department of Ecology (Ecology) of the 616 Nonradioactive Dangerous Waste Storage Facility (NRDWSF) Dangerous Waste Permit Application. Obtain clarification from Ecology on several NOD comments.

MINUTES:

A Unit Managers' meeting was held to discuss the proposed schedule for responding to the NOD comments on the 616 NRDWSF Dangerous Waste Permit Application. In addition, Ecology was requested to clarify the intent of several NOD comments. An agenda for the meeting is attached (Attachment 1) and the main topics of discussion are outlined below:

- o NOD Response Schedule. Ms. S. M. Price presented a proposed schedule for responding to the NOD. Attendees were advised that the schedule was tentative and had not yet been fully approved. The schedule calls for:
 - DOE/WHC to transmit a final NOD Response Table to Ecology by February 19, 1990.
 - Ecology to complete their review of the NOD Response Table by April 20, 1990.
 - DOE/WHC to complete and submit a revised 616 NRDWSF Dangerous Waste Permit Application to Ecology within 60 days of receipt of Ecology's review comments on the NOD Response Table (by June 19, 1990, if Ecology's review comments are received on April 20, 1990).

In addition, a draft NOD Response Table will be available for discussion at the next Unit Managers' Meeting scheduled for January 23, 1990 (Action Item 1).



o NOD Comments. Mr. R. C. Bowman, Mr. J. W. Olson, and Ms. K. A. Woodworth requested clarification on several NOD comments as detailed in Attachment 2. Results of these discussions are detailed below:

1. Topic: Discuss the schedule for responding to the NOD.

Response: Specifics associated with the schedule are detailed above.

2. Topic: What changes to the Part B (i.e. procedure changes, physical building changes, etc.) will require modification to the Permit Application? (Comments 3, 69 and 70)

Response: Ms. Lerchen of Ecology indicated that this is a generic topic that will need to be addressed for all permit applications associated with the Hanford Site. (Action Item 2)

3. Topic: What is the purpose of general comment 11 (seismic consideration)?

Response: Ms. Lerchen indicated that imposing seismic qualification requirements for treatment, storage, and disposal facilities on the Hanford Site is currently being considered by Ecology. No current action is required.

4. Topic: How will implementation of facility modifications be handled? Will we have to provide a schedule? (Comments 5 and 7)

Response: It was agreed that DOE/WHC should provide a schedule for facility modifications required to satisfy an NOD comment. (Action Item 3).

5. Topic: How are spills to be reported now with no reportable quantity requirement in effect (immediately, monthly)? (Comment 48)

Response: Ms. Lerchen stated that spill reporting needs to be in compliance with the requirements of WAC 173-303 and that the associated text in the permit application should be reviewed to ensure that it meets the intent of the requirements.

6. Topic: Why are you requiring us to implement a waste verification sampling program when it is not required? (Comment 14)

Response: Some sample verification will be necessary. Further clarification of sample verification needs will be provided by Ecology at the January 23, 1990 Unit Managers' meeting.

7. Topic: Discuss emergency plan situation. Inform Ecology that the information required for a contingency plan is maintained in several documents. (Comment 42)

Response: Ms. Lerchen indicated that the text should be modified to indicate that the contingency plan included in the permit application is a stand alone plan.

8. Topic: Discuss background sample location requirements. (Comment 56)

Response: Ms. Lerchen indicated that comparing an offsite background sample with onsite background samples could help alleviate public concerns about the quality of background samples taken on the Hanford Site. She indicated that the offsite background sampling needs only be done once as a reference, with all future Hanford Site background samples being compared to this reference data. It was agreed that a joint RCRA/CERCLA specific-topic meeting should be held on background sampling.


9. Topic: Discuss the need for a closure cost estimate. (Comment 66)

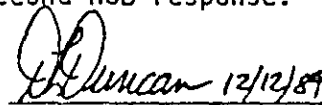
Response: Ms. Lerchen indicated that this issue should be taken up with Mr. T. M. Michelena of Ecology.

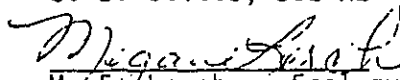
o General Comments. Ms. Lerchen indicated that the DOE/WHC consideration of the situation associated with the potential for dangerous waste release to the 616 NRWSF tile field and french drain is of utmost concern to Ecology.

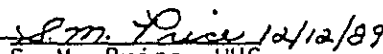
o Action Items. Key action items assigned during the meeting are summarized as follows:

1. Provide a draft NOD Response Table at the Unit Managers' Meeting scheduled for January 23, 1990. (DOE/WHC)
2. Provide direction as to how future changes to the facility, drawings, procedures, etc., are to be handled with regards to revision of the Part B Permit Application (status at January 23, 1990, Unit Managers' Meeting). (Ecology)
3. If facility modifications are determined to be necessary as a result of the NOD comments, a schedule detailing facility modification deadlines shall be provided with the final NOD Response Table (by February 19, 1990). (DOE/WHC)
4. Ms. Lerchen will provide any additional NOD comments by January 5, 1990. DOE/WHC will inform Ecology at the January 23, 1990, Unit Manager's meeting whether these comments will be responded to as part of the first or second NOD response. (Ecology, DOE/WHC)


S. D. Stites, DOE-RL


D. L. Duncan, DOE-RL


M. E. Lerchen, Ecology


S. M. Price, WHC

Attachment 1

TO: Toby Michelena: WDOE

December 11, 1989

FROM: Dan Duncan: DOE-ERD

The following is the FINAL AGENDA for the December 12, 1989 Unit Managers Meeting in Richland, WA.

LOCATION: Peoples Bank Building Conference Room 317

08:00 - 10:00 HWVP
 -NOD Comments
 -CAA Permit
 -Delay of Repository (Canister Storage)
 -SEPA Checklist/Options
 -HDW-EIS

10:00 - 10:30 616 NRDWSF
 -NOD Comments

10:00 - 12:00 Document Clearance Status
 -AG,OCC Meeting (HAPO Building Conference
 Room 319)

10:30 - 12:00 Grout Treatment Facility
 -Comment Clarification
 -Drainage Media

12:00 - 1:00 Lunch

1:00 - 2:00 300 ASE, 183-H & 2727-S Closure Plans
 -Status
 -Formal Acceptance Letter

2:00 - 3:00 January 1990 UMM
 -Agenda
 -HWVP CAA Meeting
 -Hanford Site Permit Meeting
 -Finalize Meeting Minutes

3:00 Adjourn

UNIT MANAGER'S MEETING

616 Storage Facility

December 12, 1989

1. Discuss the schedule for responding to the NOD.
2. What changes to the Part B (i.e. procedure changes, physical building changes, etc.) will require modification to the Permit Application? (Comments 3, 69 and 70)
3. What is the purpose of general comment 11 (seismic consideration)?
4. How will implementation of facility modifications be handled? Will we have to provide a schedule? (Comments 5 and 7)
5. How are spills to be reported now with no reportable quantity requirement in effect (immediately, monthly)? (Comment 48)
6. Why are you requiring us to implement a waste verification sampling program when it is not required? (Comment 14)
7. Discuss emergency plan situation. Inform Ecology that the information required for a contingency plan is maintained in several documents. (Comment 42)
8. Discuss background sample location requirements. (Comment 56)
9. Discuss the need for a closure cost estimate. (Comment 66)

DISTRIBUTION

R. C. Bowman	H4-57
G. T. Dukelow	R2-97
C. J. Geier	H4-57
R. J. Giroir	T4-01
D. W. Lindsey	R2-82
S. H. Norton	T3-28
J. W. Olson	R2-82
S. M. Price	H4-57
R. J. Roberts	R2-97
L. W. Roberts	R2-80
K. A. Woodworth	H4-55